



6. I extensively disclosed information that was confidential at the time. Mr. Sedlik's questions asked for information that was not contained in the Complaint. The information he received was confidential and I expected him to keep it as such.
7. I disclosed the following publications as a downstream market for the photographs: The New York Times, International New York Times, The New Yorker, Huffington Post, CNN/ CNN International, MSNBC, The Economist, ABC News, BBC Radio 4, Yahoo News, Chicago Tribune, The Times of India, CBS News, WPIX N.Y. News, Fox News, Time, Entertainment Weekly, Bloomberg Business, Changes Magazine, , Tiger Beat ,Craw Daddy Boston Globe, USA Today, Wall Street Journal, New York Daily News, Time-Life, Paris Match, Rolling Stone, Vogue, Esquire, GQ Magazine, Beatles Magazine, NME. Com, NPR, Guitar Player, Downbeat, Swing Journal, Jazz Weekly, Jazz Wise, The Nation, Relix, Mojo, Billboard The Berklee College of Music, Gibson Guitar Bullfinch Press, Time Warner Book Group, Unsung/Unsung Hollywood Productions and Ebony.
8. I disclosed that we found ads featuring some of the photographs, including Gibson Guitar ads, for dealers and the public.
9. The "star-photo" was distributed by Defendants for world-wide usage on ads and posters.
10. I revealed that Sydney Seidenberg's role in providing the press with publicity photos and covers of press kits. I named ABC Dunhill and ABC Booking Company as receiving the photos via B.B. King's agent.
11. I also told Mr. Sedlik about additional independent CD releases featuring the infringing photographs, including Cleopatra Records, Vinyl Passion, Blues Forever. I named specific albums that we found under each label.
12. I told Mr. Sedlik that T-shirts with infringing photographs were being sold on Six Mour Creation, teeshirtsrock.com, rockabilia.com, amazon.com, rebbuble.com.
13. In May 15, 2017 my attorney told me that he tried to negotiate a fee for Mr. Sedlik's services but that his efforts were unsuccessful. Mr. Sedlik's asked an astronomical fee from the perspective of an individual photographer. His price was prohibitive.

Executed this 29<sup>th</sup> day of December, 2017

A handwritten signature in cursive script, appearing to read "Glen Craig", is written over a horizontal line.

Glen Craig  
*Plaintiff*